

Exhibit 3

From: [Cole-Chu, Hannah](#)
To: [Bloom, Elise M.](#)
Cc: [Philion, Rachel S.](#); [Batten, Mark W.](#); [Baddish, Noa](#)
Subject: RE: Wood
Date: Thursday, November 17, 2022 10:10:17 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image105956.png](#)
[image966229.png](#)
[image748110.png](#)
[image683615.png](#)

Good morning, Elise, we'd also like to get the issue settled but to have a productive conferral we'll need until tomorrow to get you our position. I can make myself available earlier in the morning if that's helpful. What about 10:30am?

Hannah



Hannah Cole-Chu | Associate

Pronouns: she/her/hers

1225 New York Avenue, NW Suite 1200B | Washington, DC 20005

Main: 202-847-4400 Fax: 646-509-2006

Direct: 202-847-4424

Email: HColeChu@outtengolden.com

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From: Bloom, Elise M. <ebloom@proskauer.com>
Sent: Thursday, November 17, 2022 8:37 AM
To: Cole-Chu, Hannah <HColeChu@outtengolden.com>
Cc: [Philion, Rachel S.](#) <rphilion@proskauer.com>; [Batten, Mark W.](#) <mbatten@proskauer.com>; [Baddish, Noa](#) <nbaddish@proskauer.com>
Subject: [EXTERNAL] Re: Wood

Can we talk today after the deposition? I want to get the issue with the current employer settled and would prefer to talk before Friday.

We are going to send you a deposition notice later today for her continued deposition, which as I indicated, we can always adjourn if we do not need to go forward.

Elise M. Bloom

Member of the Firm

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On Nov 16, 2022, at 5:51 PM, Cole-Chu, Hannah <HColeChu@outtengolden.com> wrote:

This email originated from outside the Firm.

Hi Elise – apologies for not getting back to you about your proposed 1:30 call. We weren't available then. We're discussing internally and can set a time to confer this week. How does Friday look for you? I'm free from 11:30am-1pm, from 2:30 to 3:30, and at 4pm.

Hannah



Hannah Cole-Chu | Associate

Pronouns: she/her/hers

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From: Bloom, Elise M. <ebloom@proskauer.com>
Sent: Wednesday, November 16, 2022 4:39 PM
To: Cole-Chu, Hannah <HColeChu@outtengolden.com>
Cc: Philion, Rachel S. <rphilion@proskauer.com>; Batten, Mark W. <mbatten@proskauer.com>; Baddish, Noa <nbaddish@proskauer.com>
Subject: [EXTERNAL] Wood

Hannah-

I never heard back from you about whether you wanted to meet and confer about the subpoena to Ms. Wheatley- Diaz's current employer. Having not heard from you at all I assumed that you were not available today at 1:30. If this is no longer an issue, please advise us immediately. If it is an issue then it needs to get addressed this week.

Thank you .

Elise

Elise M. Bloom
Member of the Firm

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